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6 Chief Judge Ricardo S. Martinez
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TROY COACHMAN,

Plaintiff,

vs.

SEATTLE AUTO MANAGEMENT, INC. dba
MERCEDES BENZ OF SEATTLE and AL
MONJAZEB,

Defendants.

No.: 2:17-CV-00187-RSM

**PLAINTIFF'S PROPOSED
VOIR DIRE QUESTIONS**

Plaintiff proposes the following voir dire questions:

1. Do any of you recognize, or have you heard of, plaintiff Troy Coachman?
2. Do any of you recognize, or have you heard of, defendant Al Monjazeb?
3. Are you or anyone in your family a current or past customer of Mercedes Benz of Seattle?
4. Do you know any of the attorneys?
 - a. Beth Barrett Bloom
 - b. Jamal Whitehead
 - c. Anne Silver

d. Sheryl Willert

e. Jeffrey Wells

5. Do you know the judge and/or any of the courtroom employees?
6. Does any member of the jury panel know another panel member?
7. Has anyone ever served as a juror in a criminal or civil trial?
8. If you have served as a juror, did the jury reach a verdict?
9. Does anyone need an accommodation to help you listen or sit comfortably during the trial?
10. Has anyone ever been involved as a party in a legal dispute – meaning a claim or a law suit filed by you or against you?
11. Has anyone ever served as a witness in a legal dispute – meaning a claim or a lawsuit?
12. Does anyone have a family member who has been involved in a legal dispute – meaning a claim or a lawsuit?
13. Does anyone have a close friend who has been involved in a legal dispute – meaning a claim or a law suit?
14. If you, a family member, or close friend has been involved in a legal dispute, did the dispute involve an employment matter?
15. Does anyone believe that if something bad happens to someone, it is usually that person's fault?
16. Does anyone feel that employees should not sue employers for being treated badly in the workplace?
17. Does anyone believe juries usually allow too much money?

- 1 18. Does anyone believe that people should be allowed damages for pain and suffering only
- 2 if they have been injured physically?
- 3 19. Would anyone have difficulty allowing monetary compensation for humiliation,
- 4 personal indignity, stress, fear, anxiety, or anguish?
- 5 20. Have you or anyone in your family owned a Mercedes Benz?
- 6 21. Have you or anyone in your family owned any other brand of luxury-class vehicle?
- 7 22. Do you or a member of your household own a business?
- 8 23. Are you or a member of your household an officer of a corporation?
- 9 24. Do you or anyone in your household work in law enforcement?
- 10 25. Have you or anyone in your household served in the military?
- 11 26. Has anyone ever supervised other employees as part of their job?
- 12 27. Has anyone here ever made the decision to fire another employee from a job?
- 13 28. Does anyone have specialized knowledge – meaning education or training – in human
- 14 resource management?
- 15 29. Has anyone ever been fired from a job?
- 16 30. Has anyone themselves, a family member, or a close friend, ever had difficulty in
- 17 finding a job?
- 18 31. Does anyone have any specific beliefs or opinions about people who need a disability
- 19 accommodation to perform their jobs that would make it difficult for you to be fair and
- 20 impartial in this case, which involves disability accommodation in the workplace?
- 21 32. Do you have children or elderly parents whom you care for?
- 22 33. Has anyone themselves, a family member, or a close friend, been diagnosed with
- 23 cancer?
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1 34. Has anyone themselves, a family member, or a close friend, ever needed to take a
2 medical leave of absence from work due to an illness or injury?

3 35. Has anyone themselves, a family member, or a close friend, ever needed to request a
4 disability accommodation in order to perform their job?

5 36. Having heard the questions put to you by the court, does any other reason suggest itself
6 to you as to why you could not sit on this jury and render a fair verdict based on
7 evidence presented to you and in the context of the court's instructions to you on the
8 law?

9 37. The court staff passed along a list of witnesses expected to testify at trial. Do any of
10 you know the witnesses?

12 A. Witness List:

13 1) Judy Clark
14 2) Patricia Matteson
15 3) Douglas McDaniel
16 4) Marie Repanich
17 5) Carol A. Stimson
18 6) Diane Baldwin
19 7) Wendy Borgert
20 8) Shirley Bunton
21 9) Sarah Campbell
22 10) Kris Capps
23 11) Sonya Costa
24 12) Joy Edwards
25 13) Jason Graham
26 14) Brandon Kindle

1 15) Samantha Hicks
2 16) Allison Leahy
3 17) Delores Lopez
4 18) Marci Miller
5 19) John Ramstetter
6 20) Kamala Saxton
7 21) Christine Watson
8 22) Kathy Kindberg
9 23) David Loeser
10 24) William Kim
11 25) Cynthia Harper
12 26) Tia Deon
13 27) Erick Thund
14 28) Brad Engelbrecht
15 29) Amy Topping
16 30) Andrew Argosino
17 31) Renee Richter
18 32) Anetha Baccetti

19
20 DATED this 26th day of September, 2018.

21 FRANK FREED SUBIT & THOMAS LLP
22

23 *s/ Beth Barrett Bloom*
24

25 Beth Barrett Bloom, WSBA No. 31702
26 Anne Silver, WSBA No. 51695
27 705 Second Avenue, Suite 1200
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asilver@frankfreed.com

1 SCHROETER GOLDMARK & BENDER
2

3 *s/ Jamal N. Whitehead*
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Jamal N. Whitehead, WSBA No. 39818
6 810 Third Avenue, Suite 500
7 Seattle, WA 98104
8 Tel: (206) 622-8000
9 whitehead@sgb-law.com

10 *Attorneys for Plaintiff*
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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the United States that a copy of the foregoing document was forwarded for service upon counsel of record:

Sheryl J. Willert, WSBA # 08617 Via Facsimile
Jeffery M. Wells, WSBA #45840 Via First Class Mail
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Attorneys for Defendants
 Via CM/ECF

DATED this 26th day of September, 2018, at Seattle, Washington.

SCHROETER GOLDMARK & BENDER

s/ Virginia Mendoza
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